

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

NENAD M. KOSTIC,
Plaintiff,

v.

TEXAS A&M UNIVERSITY AT
COMMERCE,
Defendant.

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No. 3:10-cv-2265-M

**PLAINTIFF’S OPPOSED MOTION
FOR REASONABLE FEES AND COSTS**

Pursuant to 42 U.S.C. § 2000e-5(k),¹ FED. R. CIV. P. 54(d)(2)(A),² and the judgment in favor of Nenad M. Kostić (Doc. 260³), Kostić hereby moves for an award of reasonable attorney’s fees and costs (including the costs that are recoverable under 28 U.S.C. § 1920 on the bill of costs, which is part of the Appendix) incurred in the successful pursuit of this action. The Court should

¹ In any action or proceeding under this subchapter the court, in its discretion, may allow the prevailing party, other than the [EEOC] or the United States, a reasonable attorney’s fee (including expert fees) as part of the costs, and the [EEOC] and the United States shall be liable for costs the same as a private person.

² “A claim for attorney's fees and related nontaxable expenses must be made by motion unless the substantive law requires those fees to be proved at trial as an element of damages.”

³ The Court subsequently extended the usual 14-day deadline for filing this motion and the bill of costs until September 17, 2015. (Doc. 263.)

award fees, costs, and postjudgment interest as set forth below:

a. A fee of \$530,273.03, detailed as follows:

Lawyer	Hours	Rate	Fee
Brian P. Sanford	638.28	\$650	\$414,882.00
David B. Norris	398.025	\$250	\$99,506.03
David B. Norris (Law Clerk)	11.025	\$100	\$1,102.50
Ashley E. Tremain	19.44	\$225	\$4,374.00
Amy E. Gibson	1.60	\$450	\$720.00
Barry S. Hersh	5.80	\$450	\$2,610.00
Robert E. McKnight, Jr.	14.30	\$495	\$7,078.50
Total			\$530,273.03

b. Costs (including those in the bill of costs) in the total amount of \$61,995.18.

c. Postjudgment interest on \$592,268.21 from August 13, 2015.

WHEREFORE, Dr. Kostić requests that the Court award the fees and costs detailed above, and argued in the Memorandum with support from the evidence in the Appendix.

Respectfully submitted,

/s/ Brian P. Sanford

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ATTORNEYS FOR PLAINTIFF

NENAD KOSTIĆ

CERTIFICATE OF CONFERENCE

On September 17, 2015, I conferred with counsel for TAMUC, and he indicated that TAMUC will oppose this motion.

/s/ Brian P. Sanford

Brian P. Sanford

CERTIFICATE OF SERVICE

On September 17, 2015, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Brian P. Sanford

Brian P. Sanford